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6 DAVID ALONZO and all similarly situated

7
8 **UNITED STATES BANKRUPTCY COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA - SAN FRANCISCO DIVISION**
10

11 In re:
12 PG&E CORPORATION,
13 and
14 PACIFIC GAS AND ELECTRIC
15 COMPANY,
16 Debtors.

Bankruptcy Case: 3:19-bk-30088 DM
Chapter 11
(Lead Case)
(Jointly Administered)

**CLASS REPRESENTATIVE'S
NOTICE OF MOTION TO EXTEND
APPLICATION OF FEDERAL RULE
OF CIVIL PROCEDURE 23 TO
CLASS PROOFS OF CLAIM**

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18 DATE: November 19, 2019
19 TIME: 10:00 a.m.
20 DEPT: 17
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1 **TO THE HONORABLE JUDGE DENNIS MONTALI, UNITED**
2 **STATES BANKRUPTCY JUDGE, DEBTORS AND STANDARD PARTIES:**

3 **PLEASE TAKE NOTICE** that, on November 19, 2019, at 10:00 a.m., in the
4 above-entitled courtroom, a hearing will be held to consider the *Motion to Extend*
5 *Application of Federal Rule of Civil Procedure 23 to Class Proofs of Claim*
6 (“Motion”), filed by David Alonzo, the Class Representative, on behalf of himself
7 and on behalf of the putative Class. By the Motion, the David Alonzo seeks an order
8 extending the application of the Federal Rule of Civil Procedure 23 to this matter.

9 The Motion is made and based upon this Notice, the attached Memorandum of
10 Points and Authorities, the Declaration of John E. Lattin filed concurrently herewith,
11 the pleadings, papers and other documents on file in the Debtors’ Chapter 11 case,
12 and any supplemental evidence, both oral and documentary, that may be submitted to
13 this Court at or before the time of the hearing on this Motion.

14 **WHEREFORE**, David Alonzo respectfully requests that this Court enter an
15 order extending application of Federal Rule of Civil Procedure 23 to this matter and
16 such other and further relief as the Court deems just and proper.

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18 Dated: October 21, 2019

OSTERGAR LAW GROUP P.C.

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20 By: 

21 John E. Lattin
22 Attorneys for Creditor,
23 DAVID ALONZO, and all similarly situated
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1 **CERTIFICATE OF SERVICE**

2 United States District Court for the Northern District of California
3 Case No. 3:19-bk-30089 (DM)

4 **CLASS REPRESENTATIVE'S NOTICE OF MOTION AND MOTION TO**
5 **EXTEND APPLICATION OF FEDERAL RULE OF CIVIL PROCEDURE 23**
6 **TO CLASS PROOFS OF CLAIM**

7 I hereby certify that I caused the foregoing to be served and filed with the
8 Clerk of the Court for the United States District Court for the Central District of
9 California using the court's CM/ECF system on October 21, 2019.

10 I further certify that all participants in the case are registered CMF/ECF users
11 and that service will be accomplished by the court's CM/ECF system.
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15 /s/ John E. Lattin

16 John E. Lattin
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